UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW HAMPSHIRE

Laurie Ortolano, <i>Plaintiff</i> ,))
v.) Civil Action No. 1:22-cv-00326-LM
The City of Nashua, et al.,)
Defendants.))

MAYOR JAMES DONCHESS AND CHIEF FINANCIAL OFFICER JOHN GRIFFIN'S MOTION FOR LEAVE TO EXCEED PAGE LIMINT FOR THEIR MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION FOR JUDGMENT ON THE PLEADINGS

Defendants James Donchess, Mayor of the City of Nashua, New Hampshire, and John Griffin, Chief Financial Officer ("CFO") of the City of Nashua, New Hampshire (together, "Defendants"), by counsel and pursuant to Rule 7.1(a)(3) of the Local Rules and 12(c) of the Federal Rules of Civil Procedure ("FRCP"), respectfully submit as follows:

- 1. On August 23, 2022, Plaintiff filed 67-page, 198-paragraph Complaint against 11 defendants, including ten counts. The allegations span an eight-year period. Plaintiff seeks compensatory, exemplary, and punitive damages, as well as costs and attorneys' fees and a permanent injunction.
- 2. Filed contemporaneously with this Motion is Defendants' Motion for Judgment on the Pleadings, accompanied by a 31-page Memorandum of Law. The Motion is submitted on behalf of both Mayor Donchess and CFO Griffin, saving repetition that would have occurred with filing separate Motions.
- 3. Defendants seek judgment on all counts in their favor and discuss several legal theories that justify the relief requested.

- 4. No party will suffer undue prejudice by extending the 25-page limit under Local Rule 7.1(a)(3). Granting this relief will not result in undue delay of this matter.
 - 5. Under Local Rule 7.1(c), Plaintiff assents to the relief requested in this Motion.

WHREFORE, Defendants respectfully request that the Court:

- a. Grant this Motion;
- b. Extend the page limit for Defendants' Memorandum of Law in support of their Motion for Judgement on the Pleadings;
- c. Enter the Defendants' Motion for Judgement on the Pleadings, Memorandum of Law, and exhibits; and
- d. Issue any further relief the Court deems just and proper.

Respectfully submitted,

JAMES DONCHESS, MAYOR OF THE CITY OF NASHUA
JOHN GRIFFIN, CHIEF FINANCIAL
OFFICER OF THE CITY OF NASHUA
By Their Attorneys,

RATH, YOUNG AND PIGNATELLI, PC

One Capital Plaza Concord, NH 03301 (603) 226-2600

Dated: 1/11/23 /s/ Adam B. Pignatelli

Michael A. Pignatelli, NH Bar #2026 map@rathlaw.com
Adam B. Pignatelli, NH Bar #20211 abp@rathlaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on all counsel of record through the Court's electronic filing system.

Dated: 1/11/23 /s/ Adam Pignatelli
Adam Pignatelli